

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

BLACKWATER SECURITY CONSULTING,  
LLC, a Delaware Limited Liability Company; and  
BLACKWATER LODGE AND TRAINING  
CENTER, INC. a Delaware Corporation,

Plaintiffs,

v.

WESTCHESTER SURPLUS LINES  
INSURANCE COMPANY, a Georgia  
Corporation; EVANSTON INSURANCE  
COMPANY, an Illinois Corporation; FIDELITY  
AND CASUALTY COMPANY OF NEW YORK,  
a South Carolina Corporation; and LIBERTY  
INSURANCE UNDERWRITERS, a  
Massachusetts Corporation,

Defendants.

Civil Action No. 05 6020

Electronically Filed

Assigned to Judge Petrese B. Tucker

**DEFENDANTS' MOTION  
FOR LEAVE TO FILE REPLY  
MEMORANDUM**

Defendants Evanston Insurance Company (“Evanston”), The Fidelity and Casualty Company of New York (“Fidelity”) and Liberty International Underwriters (“Liberty”) (the “Moving Defendants”) move pursuant to Rule 7 of the Federal Rules of Civil Procedure and the Honorable Petrese B. Tucker’s Rules of Practice for leave to file a Reply to Plaintiffs’ Opposition to Defendants’ Motion to Transfer Venue (“Plaintiffs’ Opposition”). Moving Defendants attach a proposed Reply as Exhibit A. Moving Defendants contend that a Reply will clarify questions raised by Plaintiffs’ Opposition and address what Moving Defendants believe to be mischaracterizations of fact, law, and procedure.

WHEREFORE, Moving Defendants request that the Court allow them to file the attached Reply.

This the 31st day of May 2006.

Respectfully submitted,

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